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UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

NEBYOU SOLOMON, an individual,
Plaintiff,
vs.

Case. No.: 2:19-cv-00652-JAD-DJA

**JOINT MOTION TO EXTEND THE
DEADLINE FOR:**

- 1) **PLAINTIFF'S RESPONSE TO
DEFENDANT UNIVERSAL
PROTECTION SERVICE, LLC'S
MOTION TO DISMISS
PLAINTIFF'S THIRD
AMENDED COMPLAINT (ECF
No. 62) (FIFTH REQUEST) and;**
- 2) **PLAINTIFF'S RESPONSE TO
FASHION SHOW MALL, LLC'S
MOTION TO DISMISS
PLAINTIFF'S THIRD
AMENDED COMPLAINT (ECF
No. 71) (FOURTH REQUEST)**

LAS VEGAS METROPOLITAN POLICE
DEPARTMENT; JOSEPH LOMBARDO,
individually and in his official capacity as
Sheriff; JOHN L. PELLETIER, an
individual; RICHARD E. MAUPIN, an
individual; RYAN J. FRYMAN, an
individual; JUAN D. CONTRERAS, an
individual; ALLEN J. PAVESE, an
individual; BRANDON M. MEADS, an
individual; FASHION SHOW MALL, LLC,
a Nevada limited-liability company;
UNIVERSAL PROTECTION SERVICE,
LLC, a Nevada limited-liability company;
ANDREW ANTONIO, an individual,
EDUARDO AGUILAR, an individual,
DOES I – V, individuals,
Defendants.

ECF Nos. 84, 85

Pursuant to Local Rule 7-1(c), Plaintiff NEBYOU SOLOMON, Defendant
UNIVERSAL PROTECTION SERVICE, LLC, and Defendant FASHION SHOW MALL,
LLC, by and through their respective counsel, hereby move and request that this Court extend
the deadline to file the following:

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1 1) Plaintiff's Response to Defendant Universal Protection Service, LLC's
2 Motion to Dismiss Plaintiff's Third Amended Complaint (ECF No. 62), filed on April 7,
3 2020, by an additional 28 days, extending the deadline from July 30, 2020 to August 27,
4 2020. This is the fifth request for an extension of time for Plaintiff to file his Response.

5 2) Plaintiff's Response to Fashion Show Mall, LLC's Motion to Dismiss Third
6 Amended Complaint (ECF No. 71), filed on April 21, 2020, by an additional 28 days,
7 extending the deadline from July 30, 2020 to August 27, 2020. This is the fourth request for
8 an extension of time for Plaintiff to file his Response.

9 These requests for an extension of time are not sought for any improper purpose or
10 other purpose of delay. These requests are based upon the following:

11 Plaintiff and Defendants Universal Protection Service, LLC and Fashion Show
12 Mall, LLC have reached a settlement and are finalizing the formal agreement. The extension
13 will ensure time to execute and effectuate the terms of the agreement.

14 THEREFORE, the parties respectfully request that this Court extend the deadline
15 to file Plaintiff's Responses to 1) Defendant Universal Protection Service, LLC's Motion to
16 Dismiss Plaintiff's Third Amended Complaint (ECF No. 62) and; 2) Fashion Show Mall,
17 LLC's Motion to Dismiss Third Amended Complaint (ECF No. 71) up to and including
18 August 27, 2020.

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Nebyou Solomon v. Las Vegas Metropolitan Police Department, et al.
Case No.: 2-19-cv-00652-JAD-DJA

IT IS SO STIPULATED.

DATED this 29th day of July, 2020.

MCLETCHE LAW

/s/ Margaret A. McLetchie

Margaret A. McLetchie, NBN 10931

Alina M. Shell, NBN 11711

Leo S. Wolpert, NBN 12658

701 E. Bridger Ave., Suite 520

Las Vegas, NV 89101

Attorneys of Plaintiff Nebyou Solomon

DATED this 29th day of July, 2020.

**WEINBERG, WHEELER, HUDGINS,
GUNN & DIAL, LLC**

/s/ Jeremy R. Alberts

Jeremy R. Alberts, NBN 10497

6385 South Rainbow Blvd., Suite 400

Las Vegas, Nevada 89118

Attorneys for Defendant

Universal Protection Service LLC

DATED this 29th day of July, 2020.

KAEMPFER CROWELL

/s/ Bryan M. Viellion

Anthony J. Celeste, NBN 8776

Bryan M. Viellion, NBN 13607

1980 Festival Plaza Dr., Suite 650

Las Vegas, Nevada 89135

Attorneys of Defendant Fashion Show Mall LLC

ORDER

Good cause appearing, IT IS HEREBY ORDERED that the Joint Motion to Extend the Deadline for (1) Plaintiff's Response to Defendant Universal Protection Service, LLC's Motion to Dismiss and (2) Plaintiff's Response to Fashion Show Mall, LLC's Motion to Dismiss to August 27, 2020, [ECF Nos. 84, 85] is GRANTED.


HONORABLE JUDGE JENNIFER A. DORSEY
U.S. DISTRICT COURT JUDGE

DATED: 8-3-2020